

National Aeronautics and Space Administration

Goddard Space Flight Center
Greenbelt, MD 20771



February 28, 2012

Reply to Attn of: 140

TO: Distribution

FROM: 140/Chief Counsel

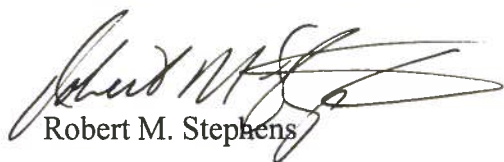
SUBJECT: Determination Regarding Attendance of NASA Employees at 2012
Annual SIA Satellite Leadership Dinner

On the evening of Monday, March 12, 2012, the Satellite Industry Association (SIA) is hosting their annual Satellite Leadership Dinner at the Melon Auditorium in Washington D.C. The purpose of the dinner is to recognize the role that satellite technologies play in the nation's economy and in national and homeland security. The dinner also acknowledges leaders in government that have made a significant contribution to advancing satellite business and/or technology.

Around 200 senior-level attendees are expected to attend, with SIA member companies represented by their CEO, COO, President or Vice Presidents. Members of both chambers of Congress, senior House and Senate staffers, and senior Administration officials from several Federal agencies, have also been invited to attend the event. The estimated food and beverage cost per person at the event is approximately \$185.00.

Based on the above, I find that the event meets the requirements of a "widely attended gathering" as defined in 5 CFR 2635.204(g). I further find that there is an Agency interest in having NASA employees attend this event given that attendance at the dinner will allow NASA employees an opportunity to discuss with other guests issues concerning NASA's space program. Accordingly, NASA employees whose duties do not substantially affect SIA may accept an invitation for free attendance to the reception for themselves and their spouses or guests, including NASA employees who are in non-career positions in which Executive Order 13490 requires signing an ethics pledge.

However, NASA employees whose duties substantially affect SIA, for instance by way of procurement duties, should seek an individual determination regarding participation in this event from their local ethics counselor.


Robert M. Stephens